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October 18, 2022

The Honorable Michael A. Hammer
U.S.M.J for the District of New Jersey
Martin Luther King Bldg. & US Courthouse
50 Walnut Street, Courtroom 2C
Newark, NJ. 07101

Re: *Evans v. Newark, et al.*, 14 CV 120

Dear Judge Hammer:

Plaintiff writes with the consent of all defense counsel, to respectfully request an extension until December 15, 2022 to file his response to Defendants' motions for summary judgment for the following reasons.

Over the last four months, Plaintiff's attorneys have done their utmost to manage an extraordinarily demanding trial schedule and several pressing deadlines. Plaintiff's counsel was on back-to-back trials first from May 23, 2022, through June 22, 2022 in the Superior Court of Los Angeles in the matter of *Huth v. Cosby*, No. BC 565560 and again from August 15, 2022 to September 14, 2022 in the Northern District of Illinois in the matter of *United States of America v. Robert Sylvester Kelly*, 19-cr-567.

During the *Kelly* trial alone, Bonjean Law Group filed two opening briefs in the Illinois appellate court in *People v. Rodriguez*, 1-21-0907 and *People v. Blue*, 5-22-0177 as well as post-trial motions in the *Huth* matter. Our firm also filed a brief in United States Court of Appeals for the Sixth Circuit in *USA v. Baker*, 2022-cr-05067 on September 30, 2022.

In addition to these briefs, since the conclusion of our trial, our firm had a restitution hearing in *People v. Kelly*, 19-cr-286 on September 28 which involved extensive briefing, a plaintiff's deposition in *Ochoa v. Lopez*, 20-cv-02977, and two depositions in the matter of *Maysonet v. Guevara*, 18-cv-02342 on October 17 and 18, 2022.



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Furthermore, Plaintiff's attorneys have a hearing in a criminal matter on October 20, 2022 in *People v. Bryant*, 13CR11571, a petition for reconsideration due on October 21, a deposition on October 25, final pretrial order due on October 28 and post-trial motions due on November 1, 2022.

Although Plaintiff is eager to litigate and resolve these summary judgment motions, Plaintiff's counsels have an overwhelming amount of deadlines over the next month and require additional time to adequately respond to Defendants' motions for summary judgment.

For the foregoing reasons, Plaintiff seeks until December 15 to file his response to motions for summary judgment.

Respectfully Submitted,

/s/ASHLEY COHEN

cc: All parties via ECF